

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

*Plaintiffs,*

V.

JOSHUA MAST, *et al.*,

*Defendants.*

Case No. 3:22-cv-49-NKM-JCH

**DEFENDANTS JOSHUA AND STEPHANIE MAST’S MOTION TO SEAL EXHIBIT 1  
TO DEFENDANT JOSHUA AND STEPHANIE MAST’S  
MOTION TO QUASH SUBPOENA OR FOR A PROTECTIVE**

Defendants Joshua and Stephanie Mast hereby move for an order to seal Exhibit 1 to their motion to quash Plaintiffs subpoena to Liberty University or for a protective order (ECF No. 347) pursuant to Local Civil Rule 9 and this Court's Protective Order (ECF No. 26).

In support of this motion to seal, Defendants Joshua and Stephanie Mast state as follows:

This Court has issued a Protective Order (ECF No. 26) allowing Plaintiffs to proceed under pseudonyms and requiring the parties to use pseudonyms. Exhibit 1 is a letter sent by Joshua and Stephanie Masts' counsel that mentions Plaintiffs John and Jane Does' last name. Accordingly, Defendants Joshua and Stephanie Mast request that the Court order the sealing of Exhibit 1, provided to the Court by email.

A proposed Order is attached as Exhibit A to this Motion.

Dated: February 25, 2024

Respectfully submitted,

/s/ Michael Francisco

John S. Moran (VSB No. 84326)

Michael L. Francisco (*pro hac vice*)

MCGUIREWOODS LLP

888 16th St. N.W., Suite 500

Black Lives Matter Plaza

Washington, DC 20006

T: (202) 828-2817

F: (202) 828-3327

[jmoran@mcguirewoods.com](mailto:jmoran@mcguirewoods.com)

[mfrancisco@mcguirewoods.com](mailto:mfrancisco@mcguirewoods.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25st day of February 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all CM/ECF participants.

Dated: February 25, 2024

Respectfully submitted,

/s/ Michael Francisco

Michael L. Francisco (*pro hac vice*)

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